The purpose of this EIR section is to analyze and disclose the anticipated growth in population that would result from plan implementation, analyze the plan's consistency with relevant planning documents and policies related to population and housing, and recommend mitigation measures to avoid or minimize the significance of potential impacts. Information in this section is based on information provided by the City of Fresno, site survey, ground and aerial photographs, and the following reference materials:

- Fresno General Plan (City of Fresno, 2014);
- Draft Master Environmental Impact Report General Plan and Development Code Update, City of Fresno, Fresno County, California (City of Fresno, 2014);
- Fresno General Plan Public Review Draft Program Environmental Impact Report (City of Fresno, 2020);
- City of Fresno Housing Element (City of Fresno, 2017);
- City of Fresno, Chapter 15, Citywide Development Code (City of Fresno, Adopted December 2015);
- US Census data (U.S. Census data, 2019);
- California Department of Finance Population and Housing Estimates (E-5 Reports) (California Department of Finance, 2019).

Comments were received during the public review period or scoping meeting for the Notice of Preparation regarding this topic from the following: Cathy Caples (August 1, 2019). The portion of this comment letter which relates to this topic is addressed within this section. Full comments received are included in **Appendix A**.

3.12.1 Environmental Setting

DEMOGRAPHICS

POPULATION TRENDS

U.S. Census data indicates that the City of Fresno experienced moderate population growth from 1990 to 2000, increasing from 354,091 to 427,719 persons at an annual average increase of 2.1 percent as shown in Table 3.12-1. During the decade from 2000 to 2010, the rate of growth continued at an annual average increase of 1.6 percent, reaching a total population of 494,665 in 2010. The city's population has increased during this decade to a population of 542,012in 2019.

TABLE 3.12-1: POPULATION GROWTH — FRESNO		
YEAR	POPULATION	Annual Average Change
1990	354,091	
2000	427,719	2.1%
2010	494,665	1.6%
2015	522,369	1.1%
2017	531,440	0.9%
2018	536,593	1.0%
2019	542 012	1 0%

TABLE 3.12-1: POPULATION GROWTH - FRESNO

Source: State of California, Department of Finance, E-4 Population Estimates for Cities, Counties, and the State, 2001-2010, with 2000 & 2010 Census Counts and E-5 Population Estimates for Cities, Counties, and the State, 2011-2020, with 2010 Census Benchmark.

HOUSING STOCK

Table 3.12-2 summarizes the growth of the City of Fresno's housing stock from the years 2000 to 2019, based on information from the US Census and California Department of Finance. The number of housing units has increased from 171,288 in 2010 to 180,632 in 2019, an average annual increase of 0.6 percent.

TABLE 3.12 -2: HOUSING UNIT GROWTH - FRESNO

YEAR	Housing Units	Annual Average Change
2000	149,053	
2010	171,288	1.5%
2015	176,915	0.7%
2017	178,819	0.5%
2019	180,632	0.5%

Source: State of California, Department of Finance, E-8 Housing Estimates for Cities, Counties, and the State, 2000-2010 and E-5 Housing Estimates for Cities, Counties, and the State, 2011-2020, with 2010 Census Benchmark.

PERSONS PER DWELLING UNIT

The average number of persons residing in a dwelling unit in Fresno is 2.97 (California Department of Finance, 2019).

JOBS: HOUSING BALANCE

As described in Section 4.11, Population and Housing, implementation of the City of Fresno General Plan Update is realistically expected to result in the construction of 76,000 new residential dwellings by the 2035 planning horizon to arrive at a total of 267,000 housing units and a population of 771,000. The City's General Plan population projection assumes total buildout of all available residential lands in the city will not be reached by the year 2035, in which case substantial population and housing growth will continue. According the City's General Plan, at the Horizon Year 2035, the General Plan can accommodate 0.48 jobs per new resident, approximately equivalent to the current percentage of the city's population in the labor force (46 percent according the 2010 U.S. Census). At General Plan horizon, the SOI could accommodate approximately a total of 108,000 new jobs above current levels, based on 0.48 jobs per 226,000 new residents anticipated by 2035. At General Plan Buildout, well after 2035, it is estimated that there would be 0.45 jobs per new resident, roughly equivalent to the current percentage of the city's population in the labor force (46 percent according to the 2010 US Census). At General Plan buildout, the SOI could accommodate approximately a total of 189,500 new jobs above current levels based on 0.45 jobs per 425,000 new residents anticipated.

GROWTH PROJECTIONS

As described in the Fresno General Plan, the city's growth is realistically expected to result in the construction of 76,000 new residential dwellings by the 2035 planning horizon to arrive at a total of

267,000 housing units and a population of 771,000. The City's General Plan residential development projection anticipates that the city will continue to develop beyond the General Plan Horizon. The city will grow into the remaining portions of the SOI that were not developed during the horizon of the General Plan. Full Buildout of this SOI is anticipated to occur well after 2035.

3.12.2 REGULATORY SETTING

STATE REGULATIONS

Senate Bill 330 "The Housing Crisis Act of 2019" is a statewide bill intended to reduce the time it takes to approve housing developments in California. SB 330 would declare a statewide housing emergency to be in effect until January 1, 2030. During that period, cities and counties found to have high rents and low rental vacancy rates would:

- Be prohibited from reducing housing densities, increasing development fees, or taking a range of other actions affecting housing development (both for-sale and rental);
- Have any such actions taken since January 1, 2018 declared null and void;
- Be prohibited from imposing fees on new units that are deed restricted for families earning less than 80% of the area median income;
- Be prohibited from enforcing requirements that new developments include parking;
- Be required to process housing development applications under the general plan and zoning ordinance in effect at the time the application is deemed complete.

Other provisions of SB 330 would apply to all jurisdictions not only those with high rents and low vacancy rates. These include requiring cities and counties to process housing development applications under the general plan and zoning ordinance in effect at the time the application is deemed complete, a ban on holding more than three de novo public hearings on a project, and a requirement that cities and counties post all development standards online. The bill would also call for the State Department of Housing and Community Development to update building standards for "occupied substandard buildings."

Fresno Council of Governments

The Fresno Council of Governments (FCOG) is an association of local governments from cities within Fresno County. The member agencies include City of Clovis, City of Coalinga, City of Firebaugh, City of Fowler, City of Fresno, City of Huron, City of Kerman, City of Kingsburg, City of Mendota, City of Orange Cove, City of Parlier, City of Reedley and City of San Joaquin, City of Sanger, City of Selma, and County of Fresno. FCOG is responsible for the preparation of, and updates to, the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) for the region. The RTP/SCS provides a 25-year transportation vision and strategies for air emissions reduction. The 2018 MTP/SCS was adopted by the FCOG board in July 2017.

Regional Transportation Plan/Sustainable Communities Strategy

The 2018 RTP is a long-range plan for transportation improvements in the region. The RTP identifies existing and future transportation related needs, while considering all modes of travel, analyzing alternative solutions, and identifying anticipated available funding for the over 3,000 projects and multiple programs. The plan is based on projections for growth in population, housing, and jobs. FCOG determines the regional growth projections by evaluating baseline data (existing housing units and employees, jobs/housing ratio, and percent of regional growth share for housing units and employees), historic reference data (based upon five- and ten-year residential building permit averages and historic county-level employment statistics), capacity data (General Plan data for each jurisdiction), and current RTP data about assumptions used in the most recent RTP/SCS. FCOG staff then meets with each jurisdiction to discuss and incorporate more subjective considerations about planned growth for each area. Finally, FCOG makes a regional growth forecast for new homes and new jobs, based upon an economic analysis provided by a recognized expert in order to estimate regional growth potential based on market analysis and related economic data. This growth forecast is then incorporated into the RTP/SCS.

Regional Housing Needs Plan

California General Plan law requires each city and county to have land zoned to accommodate a fair share of the regional housing need. The share is known as the Regional Housing Needs Allocation (RHNA). FCOG is the lead agency for developing the RHNA that includes Fresno County and the City of Fresno. The latest housing allocation for the City of Fresno covers the nearly eight-year period from 2013 through 2023 and consists of 23,565 units (2,833 extremely low, 2,833 very low, 3,289 low, 3,571 moderate, and 11,039 above moderate income). The City is not required to make development occur; however, the City must facilitate housing production by ensuring that land is available and that unnecessary development constraints have been removed. The City prepared and adopted an updated Housing Element to cover the 2013-2023 regional housing needs cycle (adoption date: April, 2017).

If a jurisdiction failed to make adequate sites available to accommodate the RHNA in the previous planning period, AB 1233 (Government Code Section 65584.09) requires the jurisdiction to identify and, if necessary, rezone sites in the first year of the current planning period to address the unaccommodated lower-income RHNA from the previous planning period. This requirement is in addition to the requirement to identify other specific sites to accommodate the RHNA for the current planning period. The City may not count capacity on the same sites for both planning periods. The City of Fresno must carry over 3,172 extremely- and very low-income units and 3,304 low-income units, for a total of 6,476 lower-income units from the 2008-2014 RHNA, as indicated by HCD in a letter to the City dated August 11, 2016 (corrected November 1, 2016).

FRESNO GENERAL PLAN

The Fresno General Plan articulates the community's vision of its long-term physical form and development. The Fresno General Plan is comprehensive in scope and represents the city's

expression of quality of life and community values. General plans are prepared under a mandate from the State of California, which requires that each city and county prepare and adopt a comprehensive, long-term general plan for its jurisdiction and any adjacent related lands. State law requires general plans to address seven mandated components: circulation, conservation, housing, land use, noise, open space, and safety. Fresno General Plan population, housing, and growth policies relevant to this EIR are identified below.

Urban Form, Land Use, and DesignElement

Objective UF-1. Emphasize the opportunity for a diversity of districts, neighborhoods, and housing types.

Policy Uf-1-a: Diverse Neighborhoods. Support development projects that provide Fresno with a diversity of urban and suburban neighborhood opportunities.

Policy Uf-1-c: Identifiable City Structure. Focus integrated and ongoing planning efforts to achieve an identifiable city structure, comprised of a concentration of buildings, people, and pedestrian-oriented activity in Downtown; along a small number of transit-oriented, mixeduse corridors and strategically located Activity Centers; and in existing and new neighborhoods augmented with parks and connected by multi-purpose trails and tree lined bike lanes and streets.

Policy UF-1-d: Range of Housing Types. Provide for diversity and variation of building types, densities, and scales of development in order to reinforce the identity of individual neighborhoods, foster a variety of market-based options for living and working to suit a large range of income levels, and further affordable housing opportunities throughout the city.

Policy UF-1-e: Unique Neighborhoods. Promote and protect unique neighborhoods and mixed use areas throughout Fresno that respect and support various ethnic, cultural and historic enclaves; provide a range of housing options, including furthering affordable housing opportunities; and convey a unique character and lifestyle attractive to Fresnans. Support unique areas through more specific planning processes that directly engage community members in creative and innovative design efforts.

Policy UF-1-f: Complete Neighborhoods, Densities, and Development Standards. Use Complete Neighborhood design concepts and development standards to achieve the development of Complete Neighborhoods and the residential density targets of the General Plan.

Objective UF-12. Locate roughly one-half of future residential development in infill areas—defined as being within the City on December 31, 2012— including the Downtown core area and surrounding neighborhoods, mixed-use centers and transit-oriented development along major BRT corridors, and other non-corridor infill areas, and vacant land.

3.12

Policy UF-12-a: BRT Corridors. Design land uses and integrate development site plans along BRT corridors, with transit-oriented development that supports transit ridership and convenient pedestrian access to bus stops and BRT station stops.

Policy UF-12-b: Activity Centers. Mixed-use designated areas along BRT and/or transit corridors are appropriate for more intensive concentrations of urban uses. Typical uses could include commercial areas; employment centers; schools; compact residential development; religious institutions; parks; and other gathering points where residents may interact, work, and obtain goods and services in the same place.

Policy UF-12-c: Local-Serving Neighborhood Centers. Design Neighborhood Centers for local services and amenities that build upon the character and identity of surrounding neighborhoods and communities.

Policy UF-12-d: Appropriate Mixed-Use. Facilitate the development of vertical and horizontal mixed-uses to blend residential, commercial, and public land uses on one or adjacent sites. Ensure land use compatibility between mixed-use districts in Activity Centers and the surrounding residential neighborhoods.

Policy UF-12-e: Access to Activity Centers. Access to Activity Centers. Promote adoption and implementation of standards supporting pedestrian activities and bicycle linkages from surrounding land uses and neighborhoods into Activity Centers and to transit stops. Provide for priority transit routes and facilities to serve the Activity Centers.

Policy UF-12-f: Mixed-Use in Activity Centers. Mixed-Use in Activity Centers. Adopt a new Development Code which includes use regulations and standards to allow for mixed-uses and shared parking facilities.

Policy UF-12-g: Impacts on Surrounding Uses. Impacts on Surrounding Uses. Establish design standards and buffering requirements for high-intensity Activity Centers to protect surrounding residential uses from increased impacts from traffic noise and vehicle emissions, visual intrusion, interruption of view and air movement, and encroachment upon solar access.

Policy UF-12-h: Parking Standards for Shared Parking. Parking Standards for Shared Parking. Explore opportunities to provide shared parking within mixed-use designations to reduce the need to construct large parking lots or structures needed for peak use times only.

Objective UF-13. Locate roughly one-half of future residential development in the Growth Areas defined as unincorporated land as of December 31, 2012 SOI-which are to be developed with Complete Neighborhoods that include housing, services, and recreation; mixed-use centers; or along future BRT corridors.

Policy UF-13-a: Future Planning to Require Design Principles. Require future planning, such as Specific Plans, neighborhood plans or Concept Plans, for Development Areas and BRT Corridors designated by the General Plan to include urban design principles and standards consistent with the Urban Form, Land Use and Design Element.

Land Use Element

Objective LU-2. Plan for infill development that includes a range of housing types, building forms, and land uses to meet the needs of both current and future residents.

Policy LU-2-a: Infill Development and Redevelopment. Promote development of vacant, underdeveloped, and re-developable land within the City Limits where urban services are available by considering the establishment and implementation of supportive regulations and programs.

Policy LU-2-b: Infill Development for Affordable Housing. Establish a priority infill incentive program for residential infill development of existing vacant lots and underutilized sites within the City as a strategy to help to meet the affordable housing needs of the community.

Policy LU-2-c: Infill Design Toolkit. Incorporate standards in the Development Code to preserve the existing residential quality of established neighborhoods.

Objective LU-4. Enhance existing residential neighborhoods through regulations, code enforcement, and compatible infill development.

Policy LU-4-a: Neighborhood Nuisance Abatement. Continue proactive and responsive code enforcement and nuisance abatement programs to improve the attractiveness of residential neighborhoods.

Policy LU-2-b: Neighborhood Reinvestment. Promote and consider partnerships with lending institutions that provide a variety of financing alternatives and adhere to the provisions of the federal Community Reinvestment Act.

Policy LU-2-c: Housing Task Force. Establish an interagency housing task force to coordinate the housing programs of the City with similar programs of other local jurisdictions and the Fresno Housing Authority to develop a coordinated affordable housing implementation plan.

Objective LU-5. Plan for a diverse housing stock that will support balanced urban growth, and make efficient use of resources and public facilities.

Policy LU-5-a: Low Density Residential Uses. Promote low density residential uses only where there are established neighborhoods with semi-rural or estate characteristics.

Policy LU-5-b: Medium-Low Density Residential Uses. Promote medium-low density residential uses to preserve existing uses of that nature or provide a transition between low and medium density residential areas.

Policy LU-5-c: Medium Density Residential Uses. Promote medium density residential uses to maximize efficient use of residential property through a wide range of densities.

Policy LU-5-d: Medium-High Density Residential Uses. Promote medium-high density residential uses to optimize use of available or planned public facilities and services and to provide housing opportunities with convenient access to employment, shopping, services, and transportation.

Policy LU-5-e: Urban Neighborhood Residential Uses. Promote urban neighborhood residential uses to support compact communities and Complete Neighborhoods that include community facilities, walkable access to parkland and commercial services, and transit stops.

Policy LU-5-f: High Density Residential Uses. Promote high-density residential uses to support Activity Centers and BRT Corridors, and walkable access to transit stops.

Policy LU-5-g: Scale and Character of New Development. Allow new development in or adjacent to established neighborhoods that is compatible in scale and character with the surrounding area by promoting a transition in scale and architectural character between new buildings and established neighborhoods, as well as integrating pedestrian circulation and vehicular routes.

Policy LU-5-h: Housing Offering Amenities. Support housing that offers residents a range of amenities, including public and private open space, landscaping, and recreation facilities with direct access to commercial services, public transit, and community gathering spaces.

Policy LU-5-i: Housing for Seniors. Facilitate the development of senior housing projects that are accessible to public transportation and services.

Policy LU-5-j: Campus-Centered Communities. Encourage development of campus-centered communities by focusing growth around existing and planned academic facilities and by directing infrastructure to those areas.

Housing Element

Goal 2. New construction of Affordable Housing.

Policy 2-1: New Construction. The General Plan is not inconsistent with this program. As discussed above in the narrative, the Regional Housing Needs Allocation (RHNA) identified a need for approximately 20,967 units for the 2008-2013 planning period. The number of potential dwelling units allowable in the land use designations proposed by the General Plan, and by zoning in the updated Development Code meet and exceed this amount. Details can be found throughout the General Plan, including increased density and development intensity (such as Table 3-1 and Table 3-2) and infill/growth area construction (Objectives UF-1, UF-12, UF-13, LU-2, LU-4, and LU-5 and supporting Policies).

Goal 3. Housing Rehabilitation, Acquisition and Neighborhood Improvements.

Policy 3-1: Neighborhood Revitalization. Although the RDA has been dissolved, this General Plan recognizes and supports the function of the RDA as is now administered by the City of Fresno in its capacity of the Housing Successor to the Redevelopment Agency of the City of Fresno, and the Successor Agency to the Redevelopment Agency of the City of Fresno. See Goal 7, 8, and 9; also Objective LU-5.

Goal 4. Housing Rehabilitation, Acquisition and Neighborhood Improvements.

3.12.3 IMPACTS AND MITIGATION MEASURES

THRESHOLDS OF SIGNIFICANCE

Based on the standards established by Appendix G of the CEQA Guidelines, the proposed Specific Plan will have a significant impact on population and housing if it will:

- Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure);
- Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

IMPACTS AND MITIGATION MEASURES

Impact 3.12-1: Implementation of the Specific Plan would not induce unplanned substantial population growth. (Less than Significant)

The proposed Specific Plan would be expected to increase the population of the city of Fresno through the future development of a mixed-use, commercial and residential development. However, the West Area Neighborhoods Specific Plan seeks to provide for the orderly and consistent development that promotes enhanced transportation infrastructure, development of core commercial centers, creation of additional parkland, and development of a diverse housing stock. The Plan Area does not currently have commercial amenities, forcing residents to travel east of State Route 99 for retail services. The Plan Area also lacks a complete roadway network and parkland.

The Specific Plan would allow for the future development of up to 54,953 dwelling units (DU) (including 67 DU in the commercial category, 47,072 DU in the residential category and 7,814 DU in the mixed use category), and 60,621,006.31 square feet (SF) of non-residential uses. The proposed land use plan also designates public facility uses that are currently existing within the Plan Area. There are also planned public facilities, including schools, ponding basins, and churches, which will be developed within the proposed Plan. In the northern portion of the Plan Area, Fire Station No. 18 is temporarily located off of West Bullard Avenue at 5938 North La Ventana Avenue. Fire Station 18 will be permanently relocated to a location on the south side of the 6000 block of West Shaw Avenue to maximize the department's response time goal. Additionally, the proposed land use plan would

allow for approximately 248 acres of park, open space, and ponding basin uses. The Specific Plan also includes circulation and utility improvements, some of which are planned in the City's current program for capital improvements.

Based on the City's General Plan Housing Element estimate of approximately 2.97 persons per dwelling unit, the proposed Specific Plan is estimated to accommodate 163,211 total residents in the City of Fresno at buildout. Population growth by itself is not considered a significant environmental impact. However, development of housing, infrastructure, and facilities and services to serve this growth can have significant environmental impacts through land conversion, commitment of resources, and other mechanisms.

The proposed Specific Plan would not induce substantial unplanned population growth in an area, either directly (i.e., by proposed new unplanned homes) or indirectly (i.e., by the extension of roads or other infrastructure). As part of the proposed Specific Plan, the draft land use map proposes the relocation of higher density land uses away from the most western and southwestern portions of the Plan Area where they are distant from public transit and community amenities and transfers those higher density land use designations to major corridors. The proposed land use plan utilizes the City's existing General Plan land use designations to maintain or re-designate some parcels in the Plan Area. Some of the designation changes include: Low Density Residential (1 to 3.5 dwelling units per acre [DU/AC]), Medium Low Density Residential (3.5 to 6 DU/AC), Medium Density Residential (5 to 12 DU/AC), Medium High Density Residential (12 to 16 DU/AC), Urban Neighborhood Residential (16 to 30 DU/AC), High Density Residential (30 to 45 DU/AC), Community Commercial (1.0 maximum floor-area-ratio [FAR]), Recreation Commercial (0.5 maximum FAR), General Commercial (2.0 maximum FAR), Regional Commercial (16 DU/AC and 1.0 maximum FAR), Office (2.0 maximum FAR), Business Park (1.0 maximum FAR), Light Industrial (1.0 maximum FAR), Corridor/Center Mixed Use (16 to 30 DU/AC and 1.5 maximum FAR), Neighborhood Mixed Use (12 to 16 DU/AC and 1.5 maximum FAR), Regional Mixed Use (30 to 45 DU/AC and 2.0 maximum FAR), Pocket Park, Neighborhood Park, Community Park, Open Space, Ponding Basin, Public Facility, Church, Special School, Elementary School, Elementary, Middle & High School, High School, and Fire Station. The City of Fresno Zoning Map designates the Plan Area as: RE, RS-1, RS2, RS-3, RS-4, RS-5, RM-1, RM-2, RM-3, RM-MH, CC, CG, CR, CRC, IL, CMX, NMX, RMX, BP, O, OS, and PR. The Fresno County Zoning Map designates the portions of the Plan Area outside the city limits as: RCC, C4, C6, M1, AE20, AL20, RR, RA, R1B, and TP. In conjunction with the approval of the Specific Plan, the parcels in the city which would have a changed land use designation as a result of the Specific Plan would be rezoned to the corresponding city zoning designation. The parcels that are currently within the county will not be rezoned. Instead, upon a proposal to annex unincorporated land into the city limits, the City of Fresno would prezone the land to a zone that is consistent with the General Plan land use. Once annexation occurs, the county zoning would not apply to the parcel.

If the Plan Area were developed based on the land use designations in the General Plan, there would be an increase of 288.66 acres of residential uses and a decrease of 153.53 acres of mixed uses (see Table 2.0-1 of Chapter 2.0 for the existing General Plan land use acreages for the Plan Area). Given

the wide density ranges specified in the General Plan for residential and mixed use development, the proposed land use designations for this Specific Plan do not vary substantially from the existing General Plan Land use designations. Therefore, the Specific Plan does not directly induce substantial unplanned population growth. This is considered a *less than significant* impact in this regard.

The Specific Plan also does not induce substantial unplanned growth indirectly (through the extension of roads or other infrastructure). Roads and infrastructure would be developed throughout the Plan Area to provide internal circulation and utilities to the proposed development and would not extend outside the Plan boundaries. Furthermore, proposed growth and annexation of the city's SOI has been accounted for within the City's General Plan 10-year planning horizon and would therefore, not induce unplanned growth through the extension of city roads and other infrastructure. This is considered a *less than significant* impact in this regard.

It is also noted that an important outcome of the proposed Specific Plan is to increase housing opportunity and stability for existing and future Plan Area residents, which is an important tool related to environmental justice. The increase of housing variety in a neighborhood offers a greater range of pricing points for entry, with accessory dwelling units and missing middle housing types typically being more affordable. Section 5.7.B of the Specific Plan discusses housing opportunities and stability.

Overall, the Specific Plan is consistent with the regional growth projections prepared by FCOG. Additionally, the City's General Plan and housing densities requirements would ensure that the population growth associated with the Plan is consistent with the City's growth management requirements. Therefore, this impact is considered *less than significant*.

Impact 3.12-2: Implementation of the Specific Plan would not displace substantial numbers of people or existing housing. (Less than significant)

The proposed Specific Plan sites where new development is focused are mostly vacant and would not result in significant displacements of residents or the loss of existing dwelling units. Even though several sites may be razed, redeveloped or converted as a result of new development, the addition of homes at all market levels will offset the loss of the few homes that exist. The proposed Specific Plan would also focus new development onto infill and vacant sites located throughout the Plan Area. New development in the Plan Area could result in the loss of a limited number of dwelling units as future sites are redeveloped to a more efficient mixed use or residential project. However, any loss of existing units that may occur as a result of future infill development is not expected to be significant. Overall, implementation of the proposed Specific Plan could result in the development of 54,953 additional residential units in the proposed specific Plan Area, primarily complementary in nature to existing single family residential currently existing in the Plan Area. Overall, construction and operation of the proposed Specific Plan would not remove a substantial number of existing housing units within the City of Fresno, and would not displace substantial numbers of residents. Therefore, this impact is considered a *less than significant*.